Rev. 04/2019

FACTS

WHAT DOES TOLLESON WEALTH MANAGEMENT DO WITH YOUR PERSONAL INFORMATION?

Why?	Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.
What?	The types of personal information we collect and share depend on the product or service you have with us. This information can include: ■ **Social Security number** and **assets** ■ **Account balances** and **transaction history** ■ **Risk tolerance** and **investment experience**
How?	All financial companies need to share **non-public** personal information to run their everyday business. In the section below, we list the reasons financial companies can share their **non-public** personal information; the reasons **Tolleson Wealth Management** chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does Tolleson Wealth Management Share?	Can you limit this sharing?
For our everyday business purposes- such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	Yes	No
For our marketing purposes- To offer our products and services to you	No	We don't share
For joint marketing with other financial companies	Yes	No
For our affiliates' everyday business purposes- Information about your transactions and experiences	Yes	No
For our affiliates' everyday business purposes- Information about your credit worthiness	No	We don't share
For our affiliates to market to you	Yes	Yes
For nonaffiliates to market to you	No	We don't share

To limit our sharing	■ **888-807-5550** Our menu will prompt through your choice(s). **Please note:** If you are a new customer, we can begin sharing your information **30** days from the date we sent this notice. When you are no longer our customer, we continue to share your information as described in this notice. However, you can contact us at any time to limit our sharing.
Questions?	Call **888-807-5550**

Who we are	
Who is providing this notice?	TOLLESON WEALTH MANAGEMENT ("Tolleson")
What we do	
How does Tolleson protect my personal information?	To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings.
How does **Tolleson** collect my personal information?	We collect your personal information, for example, when you ■ open an account or apply for a loan ■ pay your bills or show your driver's license ■ give us your contact information We also collect your personal information from others such as credit bureaus, affiliates, or other companies.
Why can't I limit all sharing?	Federal law gives you the right to limit only ■ sharing for affiliates' everyday business purposes - information about your creditworthiness ■ affiliates from using your information to market to you ■ sharing for nonaffiliates to market to you State laws and individual companies may give you additional rights to limit sharing.
What happens when I limit sharing for an Account I hold jointly with someone else?	Your choices will apply to everyone on your account - unless you tell us otherwise.
Definitions	
Affiliates	Companies related by common ownership or control. They can be financial and non financial companies. ■ *Our affiliates include companies with a Tolleson name; financial companies such as Tolleson Private Wealth Management, LP and Tolleson Private Bank.*
Non affiliates	Companies not related by common ownership or control. They can be financial and non financial companies. ■ *Tolleson Wealth Management does not share with non-affiliates so they can market to you.*
Joint Marketing	A formal agreement between nonaffiliated financial companies that together market financial products or services to you. ■ *Joint marketing is limited solely to delivery of credit card services through our third party provider and only upon request of clients.*

Tolleson Private Bank is chartered under the laws of the State of Texas and by state law is subject to regulatory oversight by the Texas Department of Banking. Any consumer wishing to file a complaint concerning Tolleson Private Bank's sale of checks, activities and/or any other complaint against Tolleson Private Bank should contact the Texas Department of Banking through one of the means indicated below:

In Person or U.S. Mail: 2601 North Lamar Boulevard, Suite 300, Austin, Texas 78705-4294

Telephone No.: 877/276-5554 • Fax No.: 512/475-1313

E-mail: consumer.complaints@dob.texas.gov • Web site: www.dob.texas.gov

TOLLESON PRIVATE BANK
5550 PRESTON ROAD, SUITE B
DALLAS, TX 75205 214.252.3033

TOLLESON WEALTH MANAGEMENT
5500 PRESTON ROAD, SUITE 250
DALLAS, TX 75205 214.252.3250

TOLLESON PRIVATE WEALTH MANAGEMENT
5500 PRESTON ROAD, SUITE 250
DALLAS, TX 75205 214.252.3250

The investment products recommended by Tolleson Private Wealth Management are:

NOT FDIC INSURED
May lose value. No bank guarantee.

MEMBER FDIC

EQUAL HOUSING LENDER

California Consumer Privacy Act Disclosure

Effective 7/1/2020

Keeping your personal information secure is one of our most important priorities. Consistent with our obligations under applicable laws and regulations, we maintain physical, technical, electronic, procedural and organizational safeguards and security measures that are designed to protect personal data against accidental, unlawful, or unauthorized destruction, loss, alteration, disclosure, or access, whether it is processed by us or elsewhere.

Legal Entities. This disclosure is effective for Tolleson Wealth Management and its related entities, Tolleson Private Bank and Tolleson Private Wealth Management.

Applicability. This California Consumer Privacy Act Disclosure explains how the legal entities listed above ("Tolleson", "we", or "us") collect, use and disclose personal information relating to California residents ("you" or "your") covered by the California Consumer Privacy Act of 2018 ("CCPA"). This notice is provided pursuant to the CCPA.

Introduction. Under the CCPA, 'Personal Information' is information that identifies, relates to, or could reasonably be linked directly or indirectly with a particular California resident. The CCPA, however, does not apply to certain information, such as information subject to the Gramm-Leach-Bliley Act ("GLBA").

The specific Personal Information that we collect, use, and disclose relating to a California resident covered by the CCPA will vary based on our relationship or interaction with that individual. For example, this Disclosure does not apply with respect to information that we collect about California residents who apply for or obtain our financial products and services for personal, family, or household purposes. For more information about how we collect, disclose, and secure information relating to these customers, please refer to our US Consumer Privacy Notice.

The following describes the information we collect about you, how it may be shared, and your rights connected with that information.

CATEGORIES OF PERSONAL INFORMATION WE COLLECT

Most of the information we have collected has been collected in the context of providing financial products and services, and is therefore not subject to the CCPA. We also collect personal information relating to California residents within our "contact us" link on our webpage.

In the past 12 months, we have collected the following categories of personal information, as defined in the CCPA, relating to California residents. The categories of personal information that we collect, use, and disclose about a California resident will depend on our specific relationship or interaction with that individual. The examples provided in each category below include both financial and non-financial information and are for illustrative purposes only, and may not reflect what Tolleson collects.

CCPA Categories	Illustrative Examples
Identifiers	Name, address, email address, social security numbers, or other similar identifiers
Personal information (as identified in the California Customer Records Act, Ca. Civ. Code §1798.80)	Contact and financial information
Protected classifications under California or federal law	Age, marital status, sex, and veteran or military status
Commercial information	Information about past transactions or purchases
Audio, electronic, visual, or similar information	Call and video recordings
Inferences drawn from other personal information	Certain inferences concerning an individual's preferences and characteristics

CATEGORIES OF SOURCES OF PERSONAL INFORMATION

In the past 12 months, we have collected personal information relating to California residents from the following sources:

Sources	Illustrative Examples
Directly from you	Interactions through our website, financial transactions, or applications for services such as loan applications, deposit account applications, or wealth management and other service applications
Affiliates	Companies related by common ownership or control, which include Tolleson Private Wealth Management and Tolleson Wealth Management
Service providers	Software providers, communication services, fraud prevention services
Third parties that you have authorized or directed to share your information with us	Payment processors, credit management programs, retailers, lenders, custodians
Government or public sources	Public data published by state or federal governments

PURPOSES FOR WHICH WE USE PERSONAL INFORMATION

Most of the information we use is in context of providing financial products or services, and is therefore not subject to the CCPA. We may use personal information relating to California residents for one or more of the following business purposes:

- Providing and maintaining our products and services
- Verifying your identity
- Detecting and preventing fraud
- Protecting against security risks
- Maintaining our facilities, systems, and infrastructure
- Improving our products and services

- Carrying out our legal and business purposes, such as complying with federal, state, or local laws, responding to civil, criminal, or regulatory lawsuits or investigations, exercising our rights or defending against legal claims, resolving complaints and disputes, performing compliance activities, performing institutional risk control, and otherwise operating, managing, and maintaining our business
- As otherwise disclosed to you at or before the point of collecting your personal information

We may also use personal information relating to California residents for one or more of the specific "business purposes" listed in the CCPA:

- Detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity
- Debugging to identify and repair errors that impair existing intended functionality
- Performing services on behalf of Tolleson or its service providers, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing financing, providing analytic services, or providing similar services on behalf of Tolleson or its service providers
- Undertaking internal research for technological development and demonstration
- Undertaking activities to verify or maintain the quality or safety of a service that is owned or controlled by Tolleson, and to improve, upgrade, or enhance the service that is owned or controlled by Tolleson

DISCLOSURE OF PERSONAL INFORMATION TO THIRD PARTIES

In the past 12 months, we have disclosed each of the above-listed categories of personal information concerning California residents for our business purposes to one or more of the following categories of third parties:

Sources	**Illustrative Examples**
Affiliates	Companies related by common ownership or control, which include Tolleson Private Wealth Management and Tolleson Wealth Management
Service providers	Software providers, communication services, fraud prevention services
Third parties, when you have authorized or directed us to share your information with them	Payment processors, credit management programs, retailers, lenders, custodians
Government entities and others, when we share information for legal or necessary purposes	Regulatory and law enforcement agencies

In the past 12 months, we have not shared personal information relating to California residents in a manner that we consider a sale within the meaning of the CCPA.

RIGHTS UNDER THE CCPA

If you are a California resident, you may request that we disclose to you the following information covering the 12 months preceding your request:

- The categories of personal information described above that we have collected about you and the categories of sources from which we collected such personal information
- The business or commercial purposes for collecting such personal information
- The categories of personal information about you that we have disclosed to third parties for a business purpose and the categories of third parties to whom we have disclosed such personal information
- The specific pieces (e.g., copies) of personal information we have collected about you

California residents also have the right to submit a request for deletion of personal information under certain circumstances, although there may be legal or other reasons that Tolleson will retain your information.

In some instances, we may decline to honor your request. For example, we may decline to honor your request if we cannot verify your identity or confirm that the personal information that we maintain relates to you, or if we cannot verify that you have the authority to make a request on behalf of another individual. In other instances, we may decline to honor your request where an exception applies, such as where the disclosure of personal information would adversely affect the rights and freedoms of another consumer or where the personal information that we maintain about you is not subject to the CCPA. Nonetheless, you have the right to be free from unlawful discrimination for exercising your rights under the CCPA.

HOW TO MAKE REQUESTS

If you are a California resident and would like to exercise the rights described above, please submit your request by contacting us at 888-807-5550, Monday through Friday, 8:00 a.m. -5:00 p.m., or writing to us at:

Tolleson Wealth Management
5500 Preston Road Suite 250
Dallas, TX 75205

Once we receive your request, we may verify your identity through your account or by requesting information sufficient to confirm your identity.

If you would like to use an agent to exercise your CCPA rights, or if you are an agent seeking to exercise CCPA rights on behalf of another person, please contact us using one of the above-referenced methods.

We may change or update this CCPA Disclosure in the future. When we do, we will post the revised CCPA Disclosure on our website. This CCPA Disclosure was last updated and became effective on the date posted at the top of this page.

CONTACT US

If you have questions about this CCPA Disclosure or our privacy notices, please contact us at 888-807-5550.